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VIA ELECTRONIC DELIVERY

April 26, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Room TWA325
Washington, DC 20554
Re: *Comment*

*ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit Unlicensed
National Information Infrastructure (U-NII) Devices in the 5 GHz Band*

*GN Docket No. 18-357, Petition for Waiver to Allow Deployment of Intelligent Transportation System
Cellular Vehicle to Everything (C-V2X) Technology*

Dear Ms. Dortch:

In April of 2018, Toyota announced that it would deploy Dedicated Short Range Communications (DSRC) systems on vehicles sold in the United States starting in 2021, with the goal of adoption across most of its automotive lineup by the mid-2020s. When making the announcement, Toyota noted that deployment of DSRC systems would assist the company in realizing its goals of creating a safer driving ecosystem and helping drivers realize a future with zero fatalities from crashes. In its announcement, Toyota encouraged other automakers and transportation infrastructure owners and operators to quickly commit to DSRC technology in the United States to realize the full safety and traffic flow benefits of the technology. At the time of the announcement, Toyota also expressed confidence that the Commission would implement a sharing mechanism for unlicensed operations in the 5.9 GHz band only if testing fully validated that such operations could safely occur in the band and not disrupt the current or future deployment of DSRC technology by existing licensees.

Although there continues to be general excitement about DSRC and the benefits of widespread deployment among key stakeholders, since our product announcement, we have not seen significant production commitments from other automakers. Unfortunately, the cooperative safety benefits of vehicle-to-vehicle (V2V) communication will not be fully realized without greater automotive industry commitment to deploy the technology.

Moreover, since our product announcement, the regulatory environment surrounding the 5.9 GHz band has become even more uncertain and unstable. In addition to the long-standing pending proceeding involving the possibility of unlicensed operation in the band, the Commission recently initiated a second proceeding to explore the possibility of reallocating channels away from DSRC to Cellular Vehicle to Everything (C-V2X). Certainly, unpredictability around whether DSRC will continue to have access to the entire 5.9 GHz band poses a significant challenge to the real-world deployment of a collision avoidance technology. For any company seeking to deploy this safety technology at a mass scale, the chance that DSRC operations could be subject to harmful interference from unlicensed operations or other technologies should they be permitted in the band, that channels used for DSRC could be reallocated after services using those channels have entered the market, or that spectrally-inefficient band fragmentation could impair the ability to expand DSRC services and applications over time creates a substantial and arguably insurmountable risk.

For these reasons, at this time, Toyota has decided to pause its deployment. We will continue to re-evaluate the deployment environment as we continue our work toward creating a safer and more efficient driving ecosystem. We welcome the opportunity to continue an open and honest dialogue with all stakeholders, including the Commission, about prioritizing vehicle-to-vehicle and vehicle-to-infrastructure deployment and the importance of collaboration to realizing the safety benefits of this technology.

To be perfectly clear, Toyota continues to be a strong supporter of DSRC technology. DSRC continues to be the only proven and available technology for collision avoidance communication and is a technology that offers these important safety benefits without reliance on a potentially costly subscription or data service plan. Importantly, based in part on the significant DSRC-related investment that has already occurred in the United States, DSRC is the only technology that we believe is capable of garnering wide industry consensus in the United States. Toyota also remains firmly committed to the position that the entire 5.9 GHz band should be preserved for DSRC and that any decision about the use of the band by unlicensed operations should be made only after thorough examination and validation of any proposed solution.

/s/Hilary M. Cain

Hilary M. Cain

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